REMARKS

Amendment D is hereby provided after careful consideration of the Examiner's comments set forth in the Office Action mailed October 21, 2008. Claims 1, 2, 4-6, 8, 9, 11, 14-17, 19-23, and 26 remain in the application and claims 29-36 are added after Amendment D is entered. Reconsideration of the application is respectfully requested in view of the amendments and remarks provided herein.

The Office Action

Claims 1-5, 7, 8, 11, 12, 15-17, 19, 20, and 23-28 stand rejected under 35 U.S.C. § 102(e) for allegedly being anticipated by U.S. Patent Application Publication No. 2004/0223504 to Wybenga et al.

Claims 3 and 18 stand rejected under 35 U.S.C. § 103(a) for allegedly being obvious over Wybenga in view of U.S. Patent No. 6,785,277 to Sundling et al.

Claims 6, 14, and 21 stand rejected under 35 U.S.C. § 103(a) for allegedly being obvious over Wybenga in view of additional background information in Wybenga.

Claims 9 and 22 stands rejected under 35 U.S.C. § 103(a) for allegedly being obvious over Wybenga in view of U.S. Patent Application Publication No. 2005/0078696 to Oner.

The Art Rejections

Claims 1, 2, 4, 5, 8, 11, 15, and 16 Patentably Distinguish Over Wybenga.

As amended, independent claim 1 is directed to a digital communication system that includes "a plurality of nodes interconnected through a fabric" with "at least one node" including "a plurality of network processing devices, at least one network processing device for receiving digital information, for determining a destination ... for the digital information, and for providing the digital information to the destination; a shared bus structure ...; and an interface ...; wherein each at least one node supports native transport of digital information to and from the fabric in a plurality of network protocols, including network protocols for transporting cell information and network protocols for transporting packet information; wherein each at least one network

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<u>processing device supports routing and forwarding of digital information within corresponding nodes in a plurality of network protocols</u>, including <u>network protocols for transporting cell information and network protocols for transporting packet information</u>.

Wybenga identifies Samsung products that provide a distributed architecture for an IP router where multiple routing engines distribute the workload of managing the interfaces and maintaining the routes (see para 9). Wybenga also discloses a distributed architecture router 100 with N independent routing nodes (RN) 110, 120, 130, 140 connected by a switch 150 which comprises a pair of high-speed switch fabrics 155a, 155b. Each routing node includes an input-output processor (IOP) module 126 and one or more physical medium device (PMD) modules 122, 124. See para 35; FIG. 1.

The Wybenga IOP module 126 includes a classification processor 230, a system processor 240, an asynchronous variable controller 250, a network processor 260, a peripheral component interconnect (PCI) bridge 270, and a Gigabit Ethernet connector 280. A PCI bus 290 connects the PCI bridge 270, classification processor 230, system processor 240, and asynchronous variables controller 250 of the Wybenga IOP module 126. The Wybenga PCI bus 290 also connects the IOP module 126 and PMD modules 122, 124. See para 39; FIG. 2.

The Wybenga router include a plurality of processors that exchange data packets with each other over a common bus where a source processor transmits a data packet to a destination processor by storing the data packet in an output queue and transmitting an interrupt message to the destination processor. In response to the interrupt message, the Wybenga destination processor reads the data packet from the output queue. See para 21.

Additionally, Wybenga discloses that each IOP module 116, 126, 136, 146 buffers incoming Internet protocol (IP) packets from subnets 195 or adjacent routers 190. Each Wybenga PMD module 122, 124 frames an incoming packet (or cell) from an IP network (or ATM switch) to be processed in an IOP module and performs bus conversion functions. See para 36; FIG. 1.

Notably, Wybenga does not disclose or fairly suggest a node (in a digital communication system) that supports native transport of digital information to and from

the fabric in network protocols for transporting cell information AND network protocols for transporting packet information OR a network processing device (in a node) that supports routing and forwarding of digital information within corresponding nodes in network protocols for transporting cell information AND network protocols for transporting packet information as recited in claim 1. Rather, **Wybenga discloses a routing node that receives packets from an IP network OR cells from an ATM switch and performs bus conversion functions in PMD modules for processing by an IOP module**. Based at least on the foregoing, it is submitted that claim 1 is patentably distinguished from Wybenga. Accordingly, the Applicant respectfully submits that independent claim 1 and claims dependent thereon (e.g., claims 2, 4, 5, 8, 11, 15, and 16) are currently in condition for allowance.

Claims 17, 19, 20, 23, and 26 Patentably Distinguish Over Wybenga.

As amended, independent claim 1 is directed to a communication node that includes "a plurality of network processing devices, at least one network processing device for receiving digital information, for determining a destination … for the digital information, and for providing the digital information to the destination …; a shared bus structure …; and a System Interface …; wherein the communication node supports native transport of digital information to and from other nodes of a communication network in a plurality of network protocols, including network protocols for transporting cell information and network protocols for transporting packet information; wherein each at least one network processing device supports routing and forwarding of digital information within the communication node in a plurality of network protocols, including network protocols for transporting cell information and network protocols for transporting packet information.

The October 21, 2008 Office Action uses the same reasons for rejection of independent claim 17 as the § 102(e) rejection of claim 1. Therefore, the disclosure of Wybenga identified above is also related to arguments distinguishing claim 17.

Notably, Wybenga does not disclose or fairly suggest a communication node that supports native transport of digital information to and from the fabric in network protocols for transporting cell information AND network protocols for transporting packet

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information OR a network processing device (in the communication node) that supports routing and forwarding of digital information within corresponding nodes in network protocols for transporting cell information AND network protocols for transporting packet information as recited in claim 1. Rather, **Wybenga discloses a routing node that receives packets from an IP network OR cells from an ATM switch and performs bus conversion functions in PMD modules for processing by an IOP module.** Based at least on the foregoing, it is submitted that claim 17 is patentably distinguished from Wybenga. Accordingly, the Applicant respectfully submits that independent claim 17 and claims dependent thereon (e.g., claims 19, 20, 23, and 26) are currently in condition for allowance.

Claims 6, 14, and 21 Patentably Distinguish Over the Combination of Wybenga and Additional Background Information in Wybenga.

Claim 6 depends from independent claim 1. Accordingly, claim 6 is patentably distinct from the combination of Wybenga and additional background information in Wybenga for at least the same reasons provided above distinguishing claim 1 from Wybenga. Based at least on the foregoing, the Applicant respectfully submits that claim 6 is currently in condition for allowance.

Similarly, claim 14 depends from claim 11 which in turn depends from independent claim 1. Accordingly, claim 14 is patentably distinct from the combination of Wybenga and additional background information in Wybenga for at least the same reasons provided above distinguishing claim 1 from Wybenga. Based at least on the foregoing, the Applicant respectfully submits that claim 14 is currently in condition for allowance.

Claim 21 depends from independent claim 17. Accordingly, claim 21 is patentably distinct from the combination of Wybenga and additional background information in Wybenga for at least the same reasons provided above distinguishing claim 17 from Wybenga. Based at least on the foregoing, the Applicant respectfully submits that claim 21 is currently in condition for allowance.

Claims 9 and 22 Patentably Distinguish Over the Combination of Wybenga and Oner.

As amended, claim 9 depends from claim 8 which in turn depends from independent claim 1. Accordingly, claim 9 is patentably distinct from the combination of Wybenga and Oner for at least the same reasons provided above distinguishing claim 1 from Wybenga. Based at least on the foregoing, the Applicant respectfully submits that claim 9 is currently in condition for allowance.

Claim 22 depends from independent claim 17. Accordingly, claim 22 is patentably distinct from the combination of Wybenga and Oner for at least the same reasons provided above distinguishing claim 17 from Wybenga. Based at least on the foregoing, the Applicant respectfully submits that claim 22 is currently in condition for allowance.

CONCLUSION

For the reasons detailed above, it is respectfully submitted all claims remaining in the application (Claims 1, 2, 4-6, 8, 9, 11, 14-17, 19-23, 26, and 29-36) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to telephone Alan C. Brandt, at (216) 363-9000.

Respectfully submitted,

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